REMARKS

The enclosed is responsive to the Examiner's Office Action mailed on February 2, 2009. At the time the Examiner mailed the Office Action, claims 1-8, 10-16, 18-35, 37-59 and 61-79 were pending. By way of the present response applicants have: 1) amended claims 1, 23, 30, 42, 53, 67, 73, and 79; and 2) added no claims; and 3) canceled no claims. As such, claims 1-8, 10-16, 18-35, 37-59 and 61-79 are now pending. Reconsideration of this application as amended is respectfully requested.

Applicants respectfully submit that the amendments are supported by the specification as originally filed. Support for the amendments is found, e.g., in paragraphs [0023], [0025], and [0034]-[0035]. No new matter has been added.

Examiner Interview

Applicants thank the Examiner for the courtesy of a telephonic interview with Applicants' representative on March 18, 2009, in which the parties discussed the rejection of the claims under §103. Applicants' representative emphasized that the references fail to disclose a virtual reality scene that is translatable and rotatable, wherein translating and or rotating the virtual reality scene results in changing the respective two-dimensional views of the media objects to give the appearance of the media objects having three dimensional qualities. No agreement was made to patentability.

Claim Rejections – 35 U.S.C. §103

Claims 1-8, 10-16, 20-35, 39-47, 50-59, 61-71, 73-77 and 79 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Gill et al., U.S. Patent No. 6,081,262 (hereinafter "Gill") and Gadh et al., U.S. Patent No. 6,525,732 (hereinafter "Gadh").

Gill describes creating a presentation with a page layout system that includes adding diverse types of media objects to the page and controlling their location within a static background. Gadh describes imaging a three-dimensional object from several viewpoints and transmitting the images to computer display to allow a user to "rotate" a virtual object by indexing about the several viewpoints.

Applicants respectfully submit that the combination of Gill and Gadh fails to disclose preparing a translation vector and a rotation matrix for each of the media objects, the rotation matrix and the translation matrix defining an orientation and a location of each of the media objects in the virtual reality scene, wherein each two-dimensional view of each media object defines a different orientation of each media object. The Office Action alleges that Gill discloses this feature in

> regulating the spatial relationship between the objects within the presentation by coordinating and managing the inputting of data into the plurality of partitions on the presentation; each object has both a position and extent on the page; the user can further define the orientation and location of the imported objects by zooming, rotating, resizing, etc. the objects.

(Office Action dated 2/2/09, page 3).

Applicants respectfully disagree with the Office Action's assertion. Gill describes that objects can be placed into partitions within a page layout, rotated, etc., however, there is no discussion of preparing a translation vector and rotation matrix

matrix for each media object.

Applicants further submit that the combination of Gill and Gadh fails to disclose:

> building the virtual reality scene for display, wherein the virtual reality scene combines the at least two media objects and includes data about each object and a relationship of each media object to the scene including layering data to be used to determine foreground and background relationships between the media objects, and the virtual reality scene is translatable and rotatable, and wherein translating and rotating the virtual reality scene results in changing the respective two-dimensional views of the media objects, including the layering of the media objects within the scene, to give the appearance of the media objects having three dimensional qualities.

(Claim 1 as currently amended).

As stated by the Office Action, Gill does not teach creating a three-dimensional virtual reality scene. Applicants submit that, the addition of a "3-D" object of Gadh as an object into the page layout of Gill will not result in the claimed three-dimensional virtual reality scene. Applicants' virtual reality scene, in at least claims 1-66, combines the at least two media objects and includes data about each object and a relationship of each media object to the scene including layering data to be used to determine foreground and background relationships between the media objects. In claims 67-79, the virtual reality scene is two-dimensional and associated with a series of two-dimensional views of the scene from various orientations or locations in three-dimensional space. In contrast, Gill partitions individual objects separately, and while objects can be "stacked," they are not combined into a three dimensional virtual reality scene nor is a virtual reality scene created that is two-dimensional and associated with a series of two-dimensional views of the scene from various orientations or locations in three-dimensional space. (see Fig. 2, and col. 7,

(see Fig. 2, and col. 7, lines 24-62, and col. 9 line 66 – col. 10, line 61). Gadh describes creating several viewpoints of a single object. Even if multiple "3-D" objects from Gadh were entered into a page layout as described in Gill, the result would not combine them into a single scene or convert the page layout itself into a series of two-dimensional views of the scene from various orientations or locations in three-dimensional space.

Furthermore, the references fail to disclose a virtual reality scene that is translatable and rotatable, and wherein translating and rotating the virtual reality scene results in changing the respective two-dimensional views of the media objects, including the layering of the media objects within the scene, to give the appearance of the media objects having three dimensional qualities. Gill describes a static background containing static and dynamic objects. (Gill, col. 16, lines 40-47). If the entire page/background is to be treated as the "scene" as alleged by the Office Action, then the combination fails to describe that the page/background is translatable and rotatable, and wherein translating and rotating the virtual reality scene results in changing the respective two-dimensional views of the media objects. Gadh only describes imaging a single object, not combining multiple objects into a scene. The alleged combination of Gill and Gadh at best would allow each single dynamic object (i.e., a 3-D image from Gadh) to be rotated individually, but not a virtual reality scene that includes the combination of at least two objects and wherein translating and rotating the scene results in changing the views of both objects, including the layering of the objects within the scene, to give the appearance of the media objects having three dimensional qualities.

Accordingly, Applicants respectfully submit that the rejection of independent claims 1, 23, 30, 42, 53, 67, 73, and 79 has been overcome.

Claims 18-19, 37-38, 48-49 and 72 and 78 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Gill and Gadh in view of Autry et al., U.S. Patent No. 5,724,106 (hereinafter "Autry").

Autry describes a remote control that includes a pointing device, keys on top of the remote control, and a trigger-like button on the bottom of the remote control to control a cursor on a monitor as a part of a graphical user interface.

Given that claims 18-19, 37-38, 48-49 and 72 and 78 are dependent upon claims 1, 30, 42, 67, and 73 respectively, and include additional features, and given that Autry fails to remedy the shortcomings of Gill and Gadh discussed above, Applicants respectfully submit that the rejection of claims 18-19, 37-38, 48-49 and 72 and 78 has been overcome for at least the same reasons as set forth above.

CONCLUSION

Applicants respectfully submit that in view of the amendments and arguments set forth herein, the applicable objections and rejections have been overcome. Applicants reserve all rights under the doctrine of equivalents.

Pursuant to 37 C.F.R. 1.136(a)(3), applicants hereby request and authorize the U.S. Patent and Trademark Office to (1) treat any concurrent or future reply that requires a petition for extension of time as incorporating a petition for extension of time for the appropriate length of time and (2) charge all required fees, including extension of time fees and fees under 37 C.F.R. 1.16 and 1.17, to Deposit Account No. 02-2666.

Respectfully submitted,

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